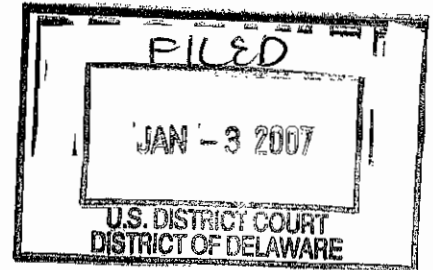


IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

JAMES A. WILSON, et al., :
Plaintiffs, :
v. : Civil Action No. 05-399-JJF
STANLEY TAYLOR, et al., :
Defendants :

INTERROGATORIES

To: Lisa Barchi, Esquire
Deputy Attorney General
Carvel State Office Building
820 North French St., 6th Fl.
Wilmington, DE 19801
Attorney for Defendants



BD scanned

COMES NOW the Plaintiffs, pro se, propounds the following Interrogatories to the defendants, subject to the conditions set forth below:

- a. These Interrogatories are continuing in character, so as to require you to file supplementary answers if you obtain further or different information before trial.
- b. Where the name or identity of a person is requested, please state full name, home address and alson business address, if known.
- c. Unless otherwise indicated, these Interrogatories refer to time, place and circumstances of the occurrence mentioned or complained of in the pleadings.
- d. Where knowledge or information in possession of a party is requested, such request includes knowledge of the party's agents, representatives and, unless privileged, his attorneys. When answer is made by a corporate Defendant, state the name, address and title of the person supplying the information, and making the Affidavit, and the source of his/her information.
- e. The pronouns "you" refers to the party to whom these interrogatories are addressed, and the persons mentioned in clause (d).

1. State in your own words the manner in which the incident which forms the subject matter of this Complaint occurred. Include a description of the events which led to the wrongful termination and transfer of Plaintiff Nathan Henry from the SCI Merit Building to the Medium Building.

2. State the names and addresses of all persons who have personal knowledge of the facts complained of in this action.

3. Name all persons who investigated the facts complained of in this action for you, and give their residence and business address.

4. Name those persons, including the Plaintiffs, who given you written and/or recorded statements concerning the facts complained of in this action and give their residence and business address. Please attached copies of their written statements to these Answers to Interrogatories.

5. Give the names and addresses of all persons who have any knowledge whatsoever of any of the facts or events which form the subject matter of the Complaint. Specify the subject matter or knowledge which each of the aforesaid witnesses has.

6. Give the name, address and telephone number of each expert the Defendant proposes to call. If a written report has been received from the said expert(s), please attach a copy to your Answers. If no such report has been received, please state the subject matter on which the expert is expected to testify, the substance of the facts and opinions to which the expert is expected to testify and a summary of the grounds for each opinion.

7. Give the names and position of any representatives of the Defendants who made or caused to be made any statement, oral or written or otherwise recorded to any individual concerning the incident complained of in the complaint, give the substance of each such statement as well as the circumstances surrounding any such statements.

8. Give the names, race, and history of disciplinary write-ups of each inmate since the opening of the SCI Merit Building in March of 2000 to the date of responding to Plaintiffs' Interrogatories.

9. State specifically and in detail each job assignment offer only to SCI Merit Building inmates. List in chronological order with pay rate, the less desirable jobs to the more desirable jobs.

10. For each inmate mentioned in number #8, state specifically and in detail each job or jobs each inmate has held while in the SCI Merit Building, and whether that inmate had a High School Diploma or a GED. List date acquired.

10. State specifically and in detail, whether jobs are posted for inmates, how inmates are choosen for jobs, and who determined whether an inmate get what job.

11. Give the name and race of each inmate that was housed in the SCI Merit Building during all times relevant to this complaint, had an application filed by the Department of Correction pursuant to 11 § 4217 for good cause which certifies the inmate should be release.

12. Give the name, address, telephone number of each and every person who was in any way responsible for the name inmates in number #11 to be granted an application pursuant to 11 Del. C. § 4217 while housed at the SCI Merit Building. As to each person, please state what part they played in the application pursuant to 11 Del. C. § 4217, with whom they spoke, the date it was submitted by building counselor, reviewed by the institution board, and the action taken as a result thereof.

12-28-06

Anthony M. M. M.

CERTIFICATE OF SERVICE

I hereby that ON December 28, 2006 I
Filed INTERROGATORIES by MAILED
At the SUSSEX CORRECTIONAL INSTITUTION
TO BE FORWARDED TO:

LISA BARCHI
Deputy Attorney General
Department of Justice
820 N. FRENCH STREET, 6th FL
Wilmington, DE 19801

Anthony Morris

I/M: Anthony alleno BLDG: men
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